

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM B. EGAN, III)	
)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:04-11721 RGS
v.)	
)	
BECHTEL CORPORATION,)	
PARSONS, BRINKERHOFF, QUADE)	
AND DOUGLAS, INCORPORATED, and)	
DYWIDAG SYSTEMS INTERNATIONAL)	
)	
Defendants.)	
)	
)	

ASSENTED TO MOTION OF DEFENDANT DYWIDAG SYSTEMS
INTERNATIONAL, U.S.A., INC. TO ADJUST DATES
FOR SERVICE OF WRITTEN DISCOVERY AND COMPLETION OF IME

Defendant Dywidag Systems International, U.S.A., Inc. ("Dywidag") moves, with the assent of plaintiff William B. Egan, III ("the plaintiff") and defendants Bechtel Corporation, Parsons, Brinkerhoff, Quade and Douglas Inc. ("BPB") (collectively referred to as "the parties") to extend, by sixty (60) days, the deadline for service of written discovery and the deadline for completion of an Independent Medical Examination. As grounds for its motion, Dywidag states as follows:

1. This is a personal injury action in which the plaintiff alleges that he sustained serious and permanent injuries when he was struck in the face with a pneumatic drill while at work on June 24, 2002.
2. The parties attended an Initial Scheduling Conference on February 10, 2005 at which various pretrial deadlines were set including, but not limited to the following: (1) parties to serve all written discovery by July 1, 2005 and (2) defendants may conduct an IME of the plaintiff by

August 1, 2005. While the parties have exchanged certain medical records and other documents, Dywidag asserts that additional time is needed in order to complete these tasks.

3. Dywidag requests that both the written discovery deadline and the IME deadline be extended by sixty (60) days. The requested extension will not alter in any way, the remaining deadlines currently in place.

4. The plaintiff and BPB have assented to the motion.

WHEREFORE, Dywidag respectfully requests that its motion be allowed and that the parties have until and including September 1, 2005 to serve written discovery and until and including September 1, 2005 for completion of an IME.

ASSENTED TO:

WILLIAM B. EGAN,
By His Counsel,
/s/Thomas R. Murphy

DYWIDAG SYSTEMS INTERNATIONAL U.S.A, INC.
By Its Counsel,
/s/ Kathleen M. Guilfoyle

*Thomas R. Murphy BBO# 546759
GIARRUSSO NORTON COOLEY & MCGLONE
Marina Bay
308 Victory Road
Quincy, MA 02171
(617) 770-2900

James M. Campbell BBO# 541882
Kathleen M. Guilfoyle BBO# 546512
CAMPBELL CAMPBELL EDWARDS & CONROY
One Constitution Plaza
Boston, MA 02129
(617) 241-3000

ASSENTED TO:

BECHTEL CORPORATION, PARSONS,
BRINKERHOFF, QUADE &
DOUGLAS, INC. AND BECHTEL/PARSONS,
By its Counsel
/s/ William J. Dailey

*William J. Dailey, Jr., BBO #112200
SLOANE & WALSH, LLP
Three Center Plaza
Boston, MA 02108
(617) 523-6010

*By Ms. Guilfoyle, per telephonic authorization of all counsel.

CERTIFICATE OF SERVICE

I certify that on June 23, 2005, a true copy of the above document was sent by first class mail, postage prepaid to the following counsel of record:

Thomas R. Murphy, Esq.
Giarrusso, Norton, Cooley & McGlone, P.C.
Marina Bay
308 Victory Road
Quincy, MA 02171

William J. Dailey, Jr., Esq.
Sloane & Walsh
Three Center Plaza
Boston, MA 02108

Kathleen M. Guilfoyle